

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS
BOSTON DIVISION

UNITED STATES OF AMERICA §
V. § CASE NO. 04-CR-10284
KRISTOFER WILFERT §

UNOPPOSED MOTION FOR EARLY TERMINATION OF PROBATION

TO THE HONORABLE UNITED STATES DISTRICT JUDGE FOR THE DISTRICT OF
MASSACHUSETTS, BOSTON DIVISION:

COMES NOW, KRISTOFER WILFERT, Defendant, in the above case, by and through
his attorney of record Douglas C. McNabb, and files his Unopposed Motion for Early
Termination of Probation, and in support would show as follows:

I.

The United States filed a two-count indictment against Mr. Wilfert and his co-
defendant on February 6, 2003. Count 1 charged Mr. Wilfert with conspiracy to distribute 50 kg
or more of marijuana in violation of 21 U.S.C. §§ 846, 841(a)(1), and (b)(1)(C). Count 2
charged him with possession with intent to distribute marijuana in violation of 21 U.S.C. §§
841(a)(1) and (b)(1)(D); 18 U.S.C. § 2.

The Grand Jury returned a superseding indictment that alleged a third count on February
13, 2003. The third count is a forfeiture count in the amount of \$63,260.

On March 16, 2003, Mr. Wilfert, in response to a summons, appeared for arraignment.
He was then released on a personal recognizance bond and placed on pretrial supervision.

On April 30, 2004, Mr. Wilfert pled guilty to count 2 of the superseding indictment and
consented to relinquish \$63,260 in currency seized at his residence.

On August 16, 2004, Mr Wilfert was sentenced to 3 years probation, 300 hours of community service to be carried out within the first two years of sentence and a \$100.00 special assessment which was paid at that time.

This case was originally filed with the United States District Court, District of Vermont, however, the case was transferred to this district due to Mr. Wilfert's employment in Boston, Massachusetts.

II.

Counsel's office has spoken to Mr. Wilfert's probation officer, Tracy Weisberg, who reports that Mr. Wilfert has served his probation since August 16, 2004 to present without event. Ms. Weisberg has notified this office that she is unopposed to this motion.

III.

Mr. Wilfert has served almost one-half of the 36 months of his probation period. He completed all 300 hours of his community service during the first 12 months of his probation. Additionally, he completed all of his counseling sessions within the first six months of his probation as his counselor felt he no longer needed them. Further, still, he was removed from the drug testing system after less than 12 months of his probation due to his continuous passing of drug tests. Mr. Wilfert has been rising through the corporate ranks at his current place of employment, The Genesis Group, a Turnaround Management/Merchant Banking Firm.

PRAYER

WHEREFORE, PREMISES CONSIDERED, Mr. Wilfert prays that this Honorable Court will grant his Unopposed Motion for Early Termination of Probation.

Respectfully submitted,
McNabb Associates, P.C.

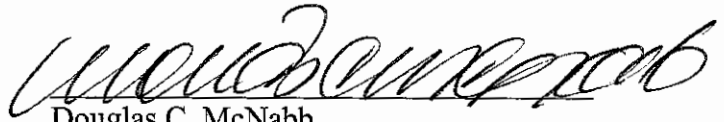


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ATTORNEY FOR DEFENDANT,
Kristofer Wilfert

CERTIFICATE OF SERVICE

I, Douglas C. McNabb, do hereby certify that on this the 26th day of January, 2006, a true and correct copy of this Unopposed Motion for Early Termination of Probation was sent via overnight mail to Tracy Weisberg, United States Probation Officer, 1 Courthouse Way, Room 305, Boston, MA 02110.



Douglas C. McNabb
Attorney for Defendant,
Kristofer Wilfert